



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

January 25, 2013

AUBREY R. MONTGOMERY, TREASURER  
KEYSTONE VICTORY FUND  
P.O. BOX 22656  
PHILADELPHIA, PA 19110

**Response Due Date**

**03/01/2013**

IDENTIFICATION NUMBER: C00470021

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2012 - 09/30/2012)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 item(s):

1. A review of the reports filed by your committee indicates that your committee received one or more receipts from another Committee (see attached) which has not been disclosed on their report(s) of receipts and disbursements. Please clarify if the contribution(s) was received from the disclosed donor's federal account and amend your report(s) if necessary. (11 CFR §104.3(b))

2. Your report discloses a reimbursement(s) for "Reimbursement - See memos if itemized" to "FMG, LLC," an apparent corporation. This appears to be an in-kind contribution made on behalf of your committee, as the original payment for the goods and services has been made by an entity other than your committee. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, salaries, telephone service, office equipment and supplies.

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), unaffiliated political committee, or any other entity would be considered an in-kind contribution from that person, committee or entity, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 C.F.R. §104.3, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b. Please be advised that 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation. Limited liability

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companies (LLC's) that choose to be treated as corporations under the Internal Revenue Service rules, or have shares that are traded publicly, are considered corporations.

Please clarify the reimbursement(s) for apparent administrative expenses made to "FMG, LLC" by your committee and provide the date(s) the goods/services were provided.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1173.

Sincerely,

A handwritten signature in black ink, appearing to read "Ashley Carter". The signature is fluid and cursive, with the first name "Ashley" being more prominent than the last name "Carter".

Ashley Carter  
Senior Campaign Finance Analyst  
Reports Analysis Division

**Contributions Received Not Disclosed by Donor Committee(s)**  
**Keystone Victory Fund (C00470021)**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Report</b>
Blank Rome PAC	7/16/2012	\$2,500.00	2012 October Quarterly
BREWERY SOFT DRINK BEER DISTR OPTICAL DENTAL MISC WORKERS WAREHOUSEMAN HELP LOCAL 830 PAC	9/17/2012	\$500.00	2012 October Quarterly
NORTH SIDE GOOD GOVERNMENT COMMITTEE	7/13/12	\$1,000.00	2012 October Quarterly